UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF TENNESSEE

NASHVILLE DIVISION

ST. CLAIR COUNTY EMPLOYEES')	Civil Action No. 3:18-cv-00988
RETIREMENT SYSTEM, Individually and on) Behalf of All Others Similarly Situated,	<u>CLASS ACTION</u>
Plaintiff,)	District Judge William L. Campbell, Jr. Magistrate Judge Alistair E. Newbern
vs. ACADIA HEALTHCARE COMPANY, INC., et al.,	PLAINTIFFS' MOTION FOR LEAVE TO FILE MOTION FOR PARTIAL SUMMARY JUDGMENT
Defendants.	
)	

PLEASE TAKE NOTICE that, pursuant to the Case Management Order (ECF 66 at 6), Lead Plaintiffs and Class Representatives Chicago & Vicinity Laborers' District Council Pension Fund and New York Hotel Trades Council and Hotel Association of New York City, Inc. Pension Fund (collectively, "Plaintiffs"), on behalf of themselves and the Class, respectfully move the Court to grant Plaintiffs leave to file a motion for partial summary judgment on the issue of reliance. This motion is based on the concurrently filed Memorandum of Law in Support of Plaintiffs' Motion for Leave to File Motion for Partial Summary Judgment and Plaintiffs' [Proposed] Motion for Partial Summary Judgment (Exhibit A), Memorandum of Law in Support of Plaintiffs' Motion for Partial Summary Judgment (Exhibit B), Plaintiffs' Statement of Undisputed Material Facts in Support of Plaintiffs' Motion for Partial Summary Judgment (Exhibit C), and the Declaration of Christopher M. Wood in Support of Plaintiffs' Motion for Partial Summary Judgment (Exhibit D).

Counsel for Plaintiffs met and conferred with Counsel for Defendants, who indicated that they oppose the relief requested herein.

ROBBINS GELLER RUDMAN & DOWD LLP JERRY E. MARTIN, #20193 CHRISTOPHER M. WOOD, #032977

DATED: April 25, 2025

/s/ Christopher M. Wood

CHRISTOPHER M. WOOD

200 31st Avenue North Nashville, TN 37203 Telephone: 615/244-2203 615/252-3798 (fax) jmartin@rgrdlaw.com cwood@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP DARREN J. ROBBINS SAM S. SHELDON (admitted *pro hac vice*) DARRYL J. ALVARADO (admitted pro hac vice) J. MARCO JANOSKI GRAY (admitted pro hac vice) TING H. LIU (admitted pro hac vice) T. ALEX B. FOLKERTH (admitted *pro hac vice*) 655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax) darrenr@rgrdlaw.com ssheldon@rgrdlaw.com dalvarado@rgrdlaw.com mjanoski@rgrdlaw.com tliu@rgrdlaw.com afolkerth@rgrdlaw.com

Class Counsel

DOWD, BLOCH, BENNETT, CERVONE, AUERBACH & YOKICH
JUSTIN J. LANNOYE
8 South Michigan Avenue, 19th Floor
Chicago, IL 60603
Telephone: 312/372-1361
312/372-6599 (fax)
jlannoye@laboradvocates.com

Counsel for Chicago & Vicinity Laborers' District Council Pension Fund

PITTA LLP MICHAEL BAUMAN 120 Broadway, 28th Floor New York, NY 10271 Telephone: 212/652-3890 212/652-3891 (fax) mbauman@pittalaw.com

Counsel for New York Hotel Trades Council & Hotel Association of New York City, Inc. Pension Fund

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on April 25, 2025, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/ Christopher M. Wood

CHRISTOPHER M. WOOD ROBBINS GELLER RUDMAN & DOWD LLP 414 Union Street, Suite 900 Nashville, TN 37219 Telephone: 615/244-2203

615/252-3798 (fax)

Email: cwood@rgrdlaw.com

Mailing Information for a Case 3:18-cv-00988 St. Clair County Employees' Retirement System v. Acadia Healthcare Company, Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

• AMALGAMATED BANK, TRUSTEE

PKNASHLAW@AOL.COM

· Darryl J. Alvarado

dalvarado@rgrdlaw.com,e file sd@rgrdlaw.com

• BOSTON RETIREMENT SYSTEM

PKNASHLAW@AOL.COM

• Michael Bauman

mbauman@pittalaw.com

• Paul Kent Bramlett

pknashlaw@aol.com

• Lisa R. Bugni

lbugni@kslaw.com

• Thomas H. Burt

burt@whafh.com

• Regina M. Calcaterra

calcaterra@whafh.com

· Jessica Perry Corley

jpcorley@kslaw.com

• Rebecca Wells Demaree

rwdemaree@cclawtn.com,dmbarker@cclawtn.com

· Patrick Donovan

donovan@whafh.com

• Timothy Alexander Benwa Folkerth

afolkerth@rgrdlaw.com,e_file_sd@rgrdlaw.com

• Elizabeth O. Gonser

egonser@rjfirm.com, dgibby@rjfirm.com, bmoore@rjfirm.com

• J. Marco Janoski Gray

 $mjanoski@rgrdlaw.com, tdevries@rgrdlaw.com, pmitchell@rgrdlaw.com, e_file_sd@rgrdlaw.com$

• Matthew M. Guiney

guiney@whafh.com

• Brandon R. Keel

bkeel@kslaw.com

• Justin J. Lannoye

jlannoye@laboradvocates.com

• Ting H. Liu

tliu@rgrdlaw.com,e_file_sd@rgrdlaw.com

• Gregory C. Logue, Sr

logueg@wmbac.com,arossini@wmbac.com

• Jerry E. Martin

jmartin@barrettjohnston.com, jfrye@barrettjohnston.com, mmcgraw@barrettjohnston.com, mfazio@barrettjohnston.com, lvandrasik@barrettjohnston.com, shyatt@barrettjohnston.com, mfazio@barrettjohnston.com, lvandrasik@barrettjohnston.com, shyatt@barrettjohnston.com, mfazio@barrettjohnston.com, lvandrasik@barrettjohnston.com, mfazio@barrettjohnston.com, lvandrasik@barrettjohnston.com, mfazio@barrettjohnston.com, lvandrasik@barrettjohnston.com, mfazio@barrettjohnston.com, lvandrasik@barrettjohnston.com, mfazio@barrettjohnston.com, mfa

Milton S. McGee , III

tmcgee@rjfirm.com, EWard@kslaw.com, AWatkins@kslaw.com, dgibby@rjfirm.com

• Thomas C. Michaud

tmichaud@vmtlaw.com

• Danielle S. Myers

 $danim@rgrdlaw.com, dmyers@ecf.courtdrive.com, e_file_sd@rgrdlaw.com$

• PLYMOUTH COUNTY RETIREMENT ASSOC

PKNASHLAW@AOL.COM

• Steven Allen Riley

sriley@rjfirm.com,dgibby@rjfirm.com

- Sam S. Sheldon ssheldon@rgrdlaw.com
- Ronni D. Solomon rsolomon@kslaw.com
- Priya Sopori psopori@nixonpeabody.com
- David F. Standa david.standa@gmlaw.com
- Robert Lee Vance bvance@wmbac.com,dwatson@wmbac.com
- David C. Walton davew@csgrr.com
- Christopher M. Wood cwood@rgrdlaw.com,CWood@ecf.courtdrive.com,pmitchell@rgrdlaw.com,e_file_sd@rgrdlaw.com

Manual Notice List

The following is the list of attorneys who are not on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

• (No manual recipients)